



Great Lakes Chemical Corporation

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May 15, 2002

Christine Todd Whitman, Administrator
U.S. Environmental Protection Agency
PO Box 1473
Merrifield, VA 22116
Attn: Chemical Right-To-Know

Re: Further Information on Phosphoric Acid Tris(methylphenyl) Ester HPV Test Plan

Dear Administrator Whitman:

Great Lakes Chemical Corporation is providing you herein additional information as to the substantial effort expended to identify all available health and environmental tests conducted with phosphoric acid tris(methylphenyl) ester, also known as tricresyl phosphate. We ask that you post this supplemental information in the appropriate area of your web site. The company is committed to the principles of the October 14, 1999 letter which emphasizes the use of existing and scientifically adequate data, full analysis of the existing data rather than a box-checking approach to fulfilling HPV requirements, and the use of scientifically appropriate categories and SAR. To be as inclusive as possible, and thus minimize the need for further testing, Great Lakes Chemical Corporation searched its product files for any and all final reports or technical correspondence pertaining to tricresyl phosphate. CHEMSTAR Aryl Phosphate Panel toxicology study files of the American Chemical Council, which would include data available from other companies, were also examined for pertinent information.

A number of electronic databases were carefully searched, by both CAS number and chemical name, to identify any publications, books, or reports on tricresyl phosphate. Among those searched were the Toxicology Data Network (TOXNET) which includes the Hazardous Substances Data Bank, Toxline, and Developmental and Reproductive Toxicity Data Base. In addition, the Safety Information Resources Inc. database was searched. PubMed (formerly MedLine) of the National Library of Medicine was also searched for any publication in which tricresyl phosphate is described. Information obtained from these electronic resources was included in the Robust Summaries submitted to the Agency. In addition, all of the data were fully analyzed for adequacy and relevance to fulfilling the SIDS endpoints.

Since its chemical structure, isomer mixture, and biological activity differ significantly from that of other aryl phosphates, tricresyl phosphate has not been placed in a category with other phosphate esters. Rather, as described in the test plan, it must be responsibly evaluated separately. Great Lakes Chemical Corporation will seek to satisfy the toxicity to aquatic plants and developmental toxicity endpoints with OECD Guidelines 201 and 414, respectively.



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We hope this information is of help to you and your staff as you prepare your comments on our tricresyl phosphate Robust Summaries and Test Plan. We look forward to receiving your comments.

Sincerely yours,

Richard Henrich